

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES :
v. : Crim. No. 21=85 (CRC)
JOHN STRAND :

MOTION TO PERMIT TRAVEL WITHIN THE DISTRICT OF COLUMBIA

Defendant, John Strand, through undersigned counsel, Stephen F. Brennwald, in support of his Motion to Permit Travel Within the District of Columbia, states as follows:

1. Defendant's co-defendant, Dr. Simone Gold, is scheduled to be sentenced by this Court on Thursday, June 16, 2022, at 10:00 a.m. The sentencing hearing will take place in person.
2. Mr. Strand and Dr. Gold will be traveling to the area (and staying in Virginia) on Tuesday, June 14, 2022, and Mr. Strand, at least, will be leaving the area on Friday, June 17, 2022.
3. While he is here, Mr. Strand will only enter the District of Columbia to meet with undersigned counsel, both on Wednesday, June 15 and on Thursday, June 16 – something his conditions of release already allow.
4. In this motion, he is asking the Court to permit him to accompany co-defendant Gold to the courthouse on the morning of June 16, 2022 and to wait for her in a plaza outside the courthouse until the hearing has concluded, at which point he hopes to be able to accompany her back to the location where they are staying in Virginia. (Undersigned counsel deduces that even if this Court were to

- impose a sentence of incarceration, given the nature of the charge to which Dr. Gold pled, she would be allowed to self-surrender.)
5. Again, Mr. Strand will not be entering the courthouse, but would wait outside while the sentencing hearing takes place. He would like to be there when she exits the courthouse to provide moral and emotional support, as well as to help her leave the area without incident.
 6. Both he and Dr. Gold would leave the city following the proceedings, unless it was necessary to meet with counsel, in which case they would be in the company of counsel while those meetings take place.
 7. The United States objects to Mr. Strand's request to come to the District on Thursday morning, June 16, 2022, for Dr. Gold's 10:00 a.m. hearing and to wait outside of the courthouse until her sentencing hearing concludes so that he can accompany her back to Virginia.

WHEREFORE, in light of the foregoing, and for any other reasons that may appear to this Court, defendant moves for the relief requested, and for any other relief this Court deems just and proper.

Respectfully submitted,

Stephen F. Brennwald

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was submitted, by ECF, this 14th day of June, 2022, to all parties of record.

Stephen F. Brennwald

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